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14 Attorneys for Plaintiffs
15 MEGAN TRAMA, MATTHEW HARTZ, and
16 RAFAEL ROBLES

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 MEGAN TRAMA, MATTHEW
21 HARTZ, and RAFAEL ROBLES on
22 behalf of themselves and all others
23 similarly situated,

24 Plaintiffs,

25 v.

26 RELX PLC, RELX GROUP PLC,
27 RELX (HOLDINGS) LIMITED, RELX
28 OVERSEAS HOLDINGS LIMITED,
RELX INC.

Defendants.

Case No. 2:24-cv-03174-DSF-E

Hon. Charles F. Eick

**[PROPOSED] STIPULATED
ORDER RE: DISCOVERY OF
ELECTRONICALLY STORED
INFORMATION**

1 **I. PURPOSE**

2 This Order will govern discovery of electronically stored information (“ESI”)
3 in this case as a supplement to the Federal Rules of Civil Procedure, this Court’s
4 Local Rules, this Court’s Standing Order on Discovery Disputes, and any other
5 applicable orders and rules. Nothing in this order is intended to alter or affect any
6 party’s rights or obligations under any order by the assigned District Judge, but shall
7 be construed instead, wherever possible, as consistent with any order by the assigned
8 District Judge.

9 **II. COOPERATION**

10 The parties are aware of the importance the Court places on cooperation and
11 commit to cooperate in good faith throughout the matter consistent with this Court’s
12 Standing Order on Discovery Disputes, the Federal Rules of Civil Procedure, and the
13 Local Rules of this Court.

14 **III. ESI PERSON(S) MOST KNOWLEDGEABLE**

15 The parties have identified ESI Person(s) Most Knowledgeable (“ESI PMK”)
16 to each other who are and will be knowledgeable about and responsible for discussing
17 their respective ESI. Each ESI PMK will be, or have access to those who are,
18 knowledgeable about the technical aspects of e-discovery, including the location,
19 nature, accessibility, format, collection, search methodologies, and production of ESI
20 in this matter. The parties will rely on the ESI PMK, as needed, to confer about ESI
21 and to help resolve disputes without court intervention.

22 **IV. PRESERVATION**

23 The parties have discussed their preservation obligations and needs and agree
24 that preservation of potentially relevant ESI will be reasonable and proportionate. To
25 reduce the costs and burdens of preservation and to ensure proper ESI is preserved,
26 the parties agree that:

27 A. ESI created or received at least after January 1, 2017 will be preserved;¹

28 _____
¹ The parties reserve the right to extend the preservation time period upon written agreement.

1 B. The parties have exchanged a list of the types of ESI they believe should
2 be preserved and the custodians, or general job titles or descriptions of custodians,
3 for whom they believe ESI should be preserved, e.g., “HR head,” “scientist,” and
4 “marketing manager.” The parties shall add or remove custodians as reasonably
5 necessary;

6 C. The parties will agree on the number of custodians per party for whom
7 ESI will be preserved.

8 D. The parties agree that there may be sources of information from which
9 collection and/or preservation is not reasonable or proportional. The parties agree to
10 meet and confer to discuss production from such sources.

11 **V. SEARCH**

12 The parties agree that in responding to an initial Fed. R. Civ. P. 34 request, or
13 earlier if appropriate, they will meet and confer about methods to search ESI to
14 identify ESI that is subject to production in discovery and filter out ESI that is not
15 subject to discovery.

16 **VI. PRODUCTION FORMATS**

17 The parties agree to produce documents in ☒ PDF, ☒ TIFF, ☒
18 native and/or ☒ paper, or a combination thereof file formats. If particular
19 documents warrant a different format, the parties will cooperate to arrange for the
20 mutually acceptable production of such documents. The parties agree not to degrade
21 the searchability of documents as part of the document production process.

22 The parties further agree to adopt the ESI Production Protocol attached hereto
23 as Exhibit A, which provides additional production format specifications.

24 **VIII. DOCUMENTS PROTECTED FROM DISCOVERY**

25 A. Pursuant to Fed. R. Evid. 502(d), the production of a privileged or work-
26 product-protected document, whether inadvertent or otherwise, is not a waiver of
27 privilege or protection from discovery in this case or in any other federal or state
28 proceeding. Nothing contained herein, however, is intended to limit a party’s right

1 to conduct a review of ESI for relevance, responsiveness and/or privilege or other
2 protection from discovery.

3 B. The parties have agreed to a process for producing privilege logs as
4 described in Exhibit A hereto. The process for handling the production of privilege
5 or otherwise protected materials is addressed in the Protective Order entered in this
6 matter.

7 C. Communications involving trial counsel that post-date the filing of the
8 complaint need not be placed on a privilege log. Communications may be identified
9 on a privilege log by category, rather than individually, if appropriate.

10 **IX. MODIFICATION**

11 This Stipulated Order may be modified by a Stipulated Order of the parties or
12 by the Court for good cause shown.

13
14 **IT IS SO STIPULATED**, through Counsel of Record.

15 Dated: January 16, 2025

SUSMAN GODFREY LLP

17 By: /s/ Krysta Kauble Pachman

Krysta Kauble Pachman

19 Attorney for Plaintiffs

20 MEGAN TRAMA, MATTHEW HARTZ, and
21 RAFAEL ROBLES

23 Dated: January 16, 2025

WINSTON & STRAWN LLP

25 By: /s/ Kevin P. Simpson

Kevin P. Simpson

27 Attorney for Defendants

28 RELX PLC, RELX GROUP PLC, RELX
(HOLDINGS) LIMITED, RELX OVERSEAS
HOLDINGS LIMITED, and RELX INC.

1
2 **IT IS ORDERED** that the forgoing Agreement is approved.

3
4
5 Dated: 1/17/25



6
7 HONORABLE CHARLES F. EICK
United States Magistrate Judge

8
9
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11 **ATTESTATION**

12 I hereby certify all signatories listed, and on whose behalf this filing is
13 submitted, concur in the filing's content and have authorized the filing.

14
15 Dated: January 16, 2025

/s/ Krysta Kauble Pachman
Krysta Kauble Pachman